FEDERAL ELECTION COMMISSION

PESCH TED PESCH TELEGION OCH TELEGION 2012 APR 26 PH 2: 57

In the matter of:

The Commission for Hope, Growth and Opportunity

MUR No. 6471

AMENDED COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW") and Melanie Sloan bring this complaint before the Federal Election Commission ("FEC or "Commission") seeking an immediate investigation and enforcement action against the Commission for Hope, Growth and Opportunity for direct and serious violations of the Federal Election Campaign Act ("FECA").

Complainants

- 2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials.

 CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.
- 3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws through its website, press releases and other methods of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing

campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

- 4. In order to assess whether an individual, candidate, political committee or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1, and in independent expenditure and electioneering communications disclosure reports that must be filed pursuant to the FECA, 2 U.S.C. § 434(c), (f); 11 C.F.R. §§ 104.20(b), 109.10(b)-(d). CREW is hindered in its programmatic activity when an individual, candidate, political committee or other regulated entity fails to disclose campaign finance information in reports required by the FECA.
- 5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated disclosure reports are the only source of information CREW can use to determine if an individual, candidate, political committee or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all disclosure reports required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.
- 6. Complainant Melanie Sloan is the executive director of Citizens for Responsibility and Ethics in Washington, a citizen of the United States, and a registered voter and resident of the District of Columbia. As a registered voter, Ms. Sloan is entitled to receive information contained in disclosure reports required by the FECA, 2 U.S.C. §§ 434(a)(2), 434(c), 434(f); 11 C.F.R. §§

104.1, 104.20(b), 109.10(b)-(d). Ms. Sloan is harmed when an individual, candidate, political committee or other regulated entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting its ability to review campaign finance information.

Respondent

7. The Commission on Hope, Growth and Opportunity ("CHGO") is an unincorporated nonprofit association organized under section 501(c)(4) of the Internal Revenue Code and based in Washington, D.C. CHGO's contact information is as follows:

Commission on Hope, Growth and Opportunity 1900 M Street, N.W. Suite 600 Washington, D.C. 20036 (202) 530-5332

8. As of April 25, 2012, CHGO was not a registered political committee.

Factual allegations

9. Between September 25 and November 2, 2010, CHGO spent \$2,314,000 on air time to broadcast television advertisements in 12 elections for seats in the House of Representatives. All of these advertisements were included on a disc attached to CREW's original complaint as Exhibit A, and are available at www.citizensforethics.org/CHGO.

¹ The Campaign Media Analysis Group ("CMAG") tracks political advertisements broadcast on local, national, and cable television. The data collected by CMAG include the date of the advertising, the market in which it was broadcast, the content of the advertising, and the estimated cost of the air time purchased.

- 10. In 10 of the elections CHGO broadcast advertisements attacking one candidate and supporting the other one.
- 11. CHGO spent \$438,310 to broadcast two advertisements attacking Rep. John Spratt (D-SC) and supporting his Republican opponent, Mick Mulvaney.
- Dance" between September 25 and October 3, 2010. Exhibit A, track 1. In this advertisement CHGO stated that even though "it's the worst economy in decades," Spratt, "instead of looking out for us, approved billions in deficit spending without missing a beat." CHGO then encouraged voters to "pull the plug on this song and dance once and for all," and to "join Mick Mulvaney's fight against the big spenders in Washington." On screen at the end of the advertisement appeared the words "Fight back. Join Mick Mulvaney. Stop the big spenders in Congress."
- CHGO spent \$198,830 to broadcast the second advertisement, titled "Collectible Coin," between October 28 and November 2, 2010. This advertisement ostensibly advertised a collectible coin commemorating President Obama "increasing our national debt to a staggering \$13.4 trillion" and Spratt's votes for the agenda of House Speaker Nancy Pelosi (D-CA). *Id.*, track 2. CHGO then told voters to call Spratt "to order yours today," and said "Mick Mulvaney has a better idea stop the spending and get America working again." On screen at the end of this advertisement appeared the words "Help Mick Mulvaney. Stop the Spending. Make America Work Again."
- 14. CHGO spent \$240,690 to broadcast the "Song and Dance" advertisement against Rep. Kathy Dahlkemper (D-PA) and in support of her opponent, Republican Mike Kelly, between September 29 and October 5, 2010. *Id.*, track 3.

- 15. CHGO spent \$238,740 to broadcast the "Song and Dance" advertisement against Rep. Frank Kratovil (D-MD) and in support of Republican Andy Harris between September 29 and October 15, 2010. *Id.*, track 4.
- 16. CHGO spent \$74,240 to broadcast the "Song and Dance" advertisement against Rep. Allen Boyd (D-FL) and in support of Republican Steve Southerland between September 29 and October 5, 2010. *Id.*, track 5.
- 17. CHGO spent \$131,830 to broadcast the "Collectible Coin" advertisement against Rep. Suzanne Kosmas (D-FL) and in support of Republican Sandy Adams between October 8 and 14, 2010. *Id.*, track 6.
- 18. CHGO spent \$101,070 to broadcast the "Collectible Coin" advertisement against Rep. Baron Hill (D-IN) and in support of Republican Todd Young between October 29 and November 1, 2010. *Id.*, track 7.
- 19. CHGO spent \$76,230 to broadcast the "Collectible Coin" advertisement against Rep. C.A. (Dutch) Ruppersberger (D-MD) and in support of Republican Marcelo Cardarelli between October 15 and November 1, 2010. *Id.*, track 8.
- 20. CHGO spent \$53,580 to broadcast the "Collectible Coin" advertisement against Rep. Paul Kanjorski (D-PA) and in support of Republican Lou Barletta between October 1 and 7, 2010.

 Id., track 9.
- 21. CHGO also spent \$263,650 to broadcast an advertisement titled "Make America Work" against Rep. John Salazar (D-CO) and in support of his Republican opponent, Scott Tipton, between October 1 and October 9, 2010. In this advertisement, CHGO first identified Salazar as a candidate, then stated Salazar "squandered billions on a bogus stimulus bill as unemployment

skyrocketed," and "led the charge with Pelosi for Obamacare, further crippling rural Colorado's economy." *Id.*, track 10. CHGO then touted Tipton, saying "he believes Coloradans know best how to create jobs and grow our economy," and encouraging voters to "help Scott Tipton make America work again."

- 22. CHGO spent \$99,160 to broadcast a similar "Make America Work" advertisement against Rep. Dan Maffei (D-NY) and in support of Republican Ann Marie Buerkle between October 25 and November 3, 2010. *Id.*, track 11. CHGO also spent \$65,860 to broadcast the "Collectible Coin" advertisement against Maffei and in support of Buerkle between October 21 and 25, 2010. *Id.*, track 12.
- 23. CHGO spent \$74,370 to broadcast the "Collectible Coin" advertisement in support of Rep. Walt Minnick (D-ID) between October 13 and 19, 2010 that did not mention his opponent.

 Id., track 13.
- 24. CHGO broadcast two additional advertisements close to the election that attacked one candidate and encouraged voters to call the candidate.
- 25. CHGO spent \$415,270 to broadcast an advertisement against Rep. Carol Shea-Porter (D-NH) between October 8 and 16, 2010. In this advertisement, CHGO noted Shea-Porter's votes for the stimulus package and the health care bill, and added "it gets worse" because Shea-Porter "voted for the Pelosi House agenda 93%" of the time. *Id.*, track 14. CHGO then encouraged voters to call Shea-Porter and "let her know if what you believe is what she believes" while the words "does she believe what we believe?" appeared on the screen.
- 26. CHGO also spent \$41,100 to broadcast a second advertisement against Boyd between October 27 and November 1, 2010. In this advertisement, CHGO asserted Boyd was one

of Pelosi's most loyal followers, but after he "voted no on Obamacare, Queen Nancy shouted 'off with his head,' and Allen quickly changed his vote to yes." CHGO then encouraged voters to call Boyd and urge him "to vote no again" and "repeal Obamacare." *Id.*, track 15.

- 27. On the screen at the end of each advertisement appeared a written disclaimer: "Paid for by the Commission on Hope, Growth and Opportunity, a tax-exempt 501(c)(4) organization and not a federal political committee. This message is not coordinated with any candidate or committee." CHGO's website, www.hopegrowthopportunity.org, appeared at the bottom of the screen.
- 28. On October 4, 2010, after some of these advertisements had aired, the Democratic Congressional Campaign Committee ("DCCC") filed a complaint with the FEC alleging CHGO failed to file any independent expenditure or electioneering communications reports for advertisements it broadcast as of October 1, 2010. Exhibit B to CREW's original complaint.
- 29. CHGO filed its 2010 Form 990 tax return with the Internal Revenue Service on or about November 14, 2011. Exhibit C (attached). CHGO reported to the IRS it spent a total of \$4,770,000 on all expenditures in 2010.
- 30. CHGO also reported paying a company called Meridian Strategies, LLC \$4,319,825 for "media placement," and \$275,000 for "media production," and \$105,175 for "advertising and technology" in 2010. CHGO further reported paying its general counsel, William Canfield, \$50,000 for legal services, and its President/Executive Director, Steven Powell, \$20,000 for management services.
- 31. CHGO reported to the IRS it did not spend any money on political activities on behalf of or in opposition to candidates for public office in 2010.

Legal background

- 32. An "independent expenditure" is an expenditure by a person for a communication "expressly advocating the election or defeat of a clearly identified candidate" that is not coordinated with a candidate or a political party. 2 U.S.C. § 431(17); 11 C.F.R. § 100.16(a).
- The Commission's regulations define "expressly advocating" as any communication that either use phrases such as "Smith for Congress" or "Bill McKay in '94," 11 C.F.R. § 100.22(a), or "[w]hen taken as a whole and with limited reference to external events, such as the proximity to the election, could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more clearly identified candidate(s) because (1) The electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and (2) Reasonable minds could not differ as to whether it encourages actions to elect or defeat one or more clearly identified candidate(s) or encourages some other kind of action," 11 C.F.R. § 100.22(b).
- 34. A public communication is "a communication by means of any broadcast, cable or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing or telephone bank to the general public, or any other form of general public political advertising." 11 C.F.R. § 100.26.
- 35. A "clearly identified candidate" is one whose name, nickname, photograph or drawing appears, or whose identity is apparent through unambiguous reference. 11 C.F.R. § 100.17.
- 36. The FECA requires a person (including a political committee) who makes independent expenditures aggregating \$10,000 or more on a given election in a calendar year up to the 20th day before the date of an election to file a report describing the expenditure with the Commission within 48 hours. 2 U.S.C. § 434(g)(2)(A). Commission regulations specify that the

report must be filed not later than "11:59 p.m. Eastern Standard/Daylight Time on the second day following the date on which a communication that constitutes an independent expenditure is publicly distributed or otherwise publicly disseminated." 11 C.F.R. § 109.10(c).

- 37. The FECA further requires a person (including a political committee) who makes independent expenditures aggregating \$1,000 or more on a given election after the 20th day before the date of an election but more than 24 hours before the day of the election to file a report describing the expenditure with the Commission within 24 hours. 2 U.S.C. § 434(g)(1)(A). Commission regulations specify that the report must be filed not later than "11:59 p.m. Eastern Standard/Daylight Time on the day following the date on which a communication is publicly distributed or otherwise publicly disseminated." 11 C.F.R. § 109.10(d).
- 38. The FECA and the Commission's regulations define an "electioneering communication" as any broadcast, cable, or satellite communication that: (1) refers to a clearly identified candidate for Federal office; (2) is publicly distributed within 60 days before a general election for the office sought by the candidate; and (3) is targeted to the relevant electorate, in the case of a candidate for the House of Representatives. 2 U.S.C. § 434(f)(3)(A); 11 C.F.R. § 100.29(a).
- \$10,000 or more during a calendar year to file a statement describing the disbursement within 48 hours. 2 U.S.C. § 434(f)(1). Commission regulations specify that the report must be filed not later than "11:59 p.m. Eastern Standard/Daylight Time on the day following the disclosure date." 11 C.F.R. § 104.20(b).

- 40. The FECA and FEC regulations define a "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." 2 U.S.C. § 431(4)(A); 11 C.F.R. § 100.5(a). "Expenditures" for the purpose of this definition only includes "funds used for communications that expressly advocate the election or defeat of a clearly identified candidate," *Buckley v. Valeo*, 424 U.S. at 80.
- 41. In addition, only organizations whose "major purpose" is the nomination or election of federal candidates can be "political committees." *Id.* at 79. The FEC conducts a fact-intensive case-by-case analysis of an organization to determine if its major purpose is the nomination or election of federal candidates. Federal Election Commission, Political Committee Status, Supplemental Explanation and Justification, 72 Fed. Reg. 5595, 5601 (Feb. 7, 2007) ("Supplemental E&J"); *The Real Truth About Obama, Inc. v. FEC*, 796 F. Supp. 2d 736, 751 (E.D. Va. 2011). An organization can satisfy the major purpose doctrine through sufficiently extensive spending on federal campaign activity. *See FEC v. Massachusetts Citizens for Life, Inc.*, 479 U.S. 238, 262 (1986); Supplemental E&J, 72 Fed. Reg. at 5601.
- 42. All political committees are required to register with the FEC within 10 days of becoming a political committee. 2 U.S.C. § 433(a); 11 C.F.R. § 102.1(d).
- 43. The FECA and FEC regulations require all political committees to file periodic reports with the FEC. 2 U.S.C. § 434(a)(4); 11 C.F.R. § 104.1(a). These reports must, among other things: (1) identify all individuals who contribute an aggregate of more than \$200 in a year to the political committee and the amount individual each contributed; (2) identify all political committees

that made a contribution and the amount each committee contributed; (3) detail outstanding debts and obligations; and (4) list all expenditures. 2 U.S.C. § 434(b); 11 C.F.R. § 104.3.

Count I

- 44. The television advertisements CHGO broadcast were either independent expenditures or electioneering communications, but none of them have been reported to the Commission.
- 45. Nearly all of CHGO's advertisements are independent expenditures because they expressly advocated for the election or defeat of one or more clearly identified candidate. All of the advertisements clearly identified by name and by photograph and/or video either both the Republican and Democratic candidates or one of them. By telling voters to "fight back" and "join" a candidate's fight, "help" a candidate, or "pull the plug" on a candidate's "song and dance," the advertisements could only be reasonably interpreted as containing advocacy of the election or defeat of the candidates.
- 46. CHGO spent more than \$10,000 in each of the 11 House races in which it broadcast advertisements expressly advocating the election or defeat of candidates.
- 47. For each of the advertisements broadcast up to 20 days before the date of the election, CHGO should have filed an independent expenditure report with the Commission within 48 hours. For each of the advertisements broadcast within 20 days of the date of the election, CHGO should have filed an independent expenditure report with the Commission within 24 hours.
- 48. As of April 25, 2012, CHGO had not filed any independent expenditure reports regarding the advertisements.

- 49. Even if some of these advertisements were not independent expenditures, all of them were electioneering communications because they (1) referred to a clearly identified candidate or candidates, (2) were publicly distributed within 60 days of the election, and (3) were targeted to the relevant electorates. For the same reason, the two advertisements in which CHGO clearly identified one candidate and encouraged voters to call the candidate were electioneering communications.
- 50. CHGO should have filed electioneering communications reports with the Commission for each of the advertisements within 48 hours.
- 51. As of April 25, 2012, CHGO had not filed any electioneering communications reports regarding the advertisements.
- 52. By broadcasting advertisements that were either independent expenditures or electioneering communications and failing to report those expenditures to the FEC, CHGO violated 2 U.S.C. § 434(g) and 11 C.F.R. § 109.10(c)-(d), and/or 2 U.S.C. § 434(f)(1) and 11 C.F.R. § 104.20(b).
- 53. The filing of the DCCC complaint put CHGO on notice that its failure to report its independent expenditures or electioneering communications violated the FECA and relevant regulations. By failing to report its independent expenditures or electioneering communications arising from broadcasting advertisements after the DCCC filed its complaint, CHGO's violations were knowing and willful and thus subject to criminal penalties and referral to the Department of Justice. 2 U.S.C. §§ 437g(a)(5)(C), 437g(d)(1).

Count Il

54. An independent expenditure or electioneering communication in the form of a communication transmitted through television must include a disclaimer. 2 U.S.C. § 441d(d)(2); 11

C.F.R. § 110.11(c)(4). The communication must include the audio statement that "[the person paying for the communication] is responsible for the content of this advertising," conveyed by a representative of the person paying for the communication either in an unobscured, full-screen view of the representative or in a voiceover. 2 U.S.C. § 441d(d)(2); 11 C.F.R. § 110.11(c)(4)(i)-(ii). The communication must also include this statement in a "clearly readable manner." 2 U.S.C. § 441d(d)(2); 11 C.F.R. § 110.11(c)(4)(iii).

55. All of the television advertisements paid for by CHGO were independent expenditures or electioneering communications, but none of them included either the audio or written disclaimer stating CHGO is responsible for the content of the advertising. By failing to include the disclaimer, CHGO violated 2 U.S.C. § 441d(d)(2) and 11 C.F.R. § 110.11(c)(4).

Count III

- 56. CHGO was a political committee in 2010, but failed to register as one with the FEC.
- 57. CHGO made expenditures expressly advocating the election or defeat of candidates aggregating in excess of \$1,000 during 2010.
- 58. As demonstrated by its extensive spending on federal campaign activity, CHGO's major purpose in 2010 was the nomination or election of federal candidates.
- 59. Between September 25 and November 2, 2010, CHGO spent \$2,314,000 on air time to broadcast for television advertisements that were either independent expenditures or electioneering communications in 12 elections for seats in the House of Representatives. This \$2,314,000 is approximately 53 percent of the total of \$4,319,825 CHGO paid to Meridian Strategies for all media placement.

- 60. On information and belief, CHGO also paid for the production of the advertisements that were either independent expenditures or electioneering communications. CHGO reported paying Median Strategies \$275,000 for "media production." Assuming CHGO's media production costs were divided in the same ratio as its media placement expenses, CHGO spent approximately \$145,000 on media production costs for its advertisements related to the nomination or election of federal candidates.
- 61. Added together, CHGO's spending on air time for its advertisements related to the nomination or election of federal candidates (\$2,314,000) and its likely media production spending for those ads (\$145,000) equals \$2,459,000. CHGO reported on its tax return spending a total of \$4,770,000 on all activities in 2010, making activity related to the nomination or election of federal candidates 51.5 percent of its total spending.
- 62. CHGO also paid Mr. Canfield \$50,000 for legal services and Mr. Powell \$20,000 for management services. On information and belief, some of their activities were related to the advertisements that were either independent expenditures or electioneering communications.

 Accordingly, the portion of CHGO's total expenditures spent on activities related to the nomination or election of federal candidates is even higher than 51.5 percent.
- 63. CHGO may have spent more money on federal campaign activities. CHGO reported paying Meridian Strategies \$105,175 for "advertising and technology." Some of this amount may have been related to CHGO's advertisements that were either independent expenditures or electioneering communications. In addition, CHGO may have paid to air these or similar political ads on local cable networks, but CMAG does not track these broadcasts.

- 64. CHGO's spending on federal campaign activity constituted at least half of its total expenditures for 2010, making the nomination or election of federal candidates its major purpose.
 - 65. CHGO is not, and has never been, a registered political committee with the FEC.
- 66. By failing to register as a political committee, CHGO violated 2 U.S.C. § 433(a) and 11 C.F.R. § 102.1(d).

Count IV

- 67. As a political committee, CHGO was required to file periodic reports with the FEC that, among other things: (1) identified all individuals who contributed an aggregate of more than \$200 in a year to CHGO and the amount individual each contributed; (2) identified all political committees that made a contribution to CHGO and the amount each committee contributed; (3) detailed CHGO's outstanding debts and obligations; and (4) listed all of CHGO's expenditures.
 - 68. CHGO failed to file any of these reports with the FEC.
- 69. By failing to file these reports, CHGO violated 2 U.S.C. § 434(a)(4) and 11 C.F.R. § 104.1(a).

Conclusion

WHEREFORE, Citizens for Responsibility and Ethics in Washington and Melanie Sloan request that the FEC conduct an investigation into these allegations, declare the respondent to have violated the FECA and applicable FEC regulations, impose sanctions appropriate to these violations and take such further action as may be appropriate, including referring this case to the Department of Justice for criminal prosecution.

ON BEHALF OF COMPLAINANTS

Melanie Sloan
Executive Director
Citizens for Responsibility and Ethics in
Washington
1400 Eye St., N.W., Suite 450
Washington, D.C. 20005
(202) 408-5565 (phone)
(202) 588-5020 (fax)

Verification

Citizens for Responsibility and Ethics in Washington and Melanie Sloan hereby verify that the statements made in the attached Complaint are, upon information and belief, true. Sworn

pursuant to 18 U.S.C. \$ 1001.

Melanie Sloan

Sworn to and subscribed before me this 26th day of April, 2012.

District of Columbia, Notary Public My Commission Expires

July 31, 2014

EXHIBIT C

SCANNED DEC 2 1 2011

Return of Organization Exempt From Income Tax Under section 501(c), 527, or 4947(s)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

OMB No. 1545-0047

The organization may have to use a copy of this return to satisfy state reporting requirements.

A F	or the	2010 calendar year, or tax year beginning and o	nding		
BQ	heck If oplicable	C Name of organization		D Employer Identific	ation number
	Addres	COMMISSION ON HOPE, GROWTH & OPPORTUNI	TY		
	Name	Doing Business As THE COMMISSION		27-1	920168
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JV	Vebsit	WWW.HOPEGROWTHOPPORTUNITY.COM		H(c) Group exemption	•
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Activities & Governance		INTENDS TO INFORM THE AMERICAN PUBLIC THA			
Ę		Check this box If the organization discontinued its operations or dispose	ed of more	1 1	sets.
ð.		Number of voting members of the governing body (Part VI, line 1a)	• • •	3	
4		Number of independent voting members of the governing body (Part VI, line 1b) [otal number of individuals employed in calendar year 2010 (Part V, line 2a)		4	
3		Total number of individuals employed in Calandar year 2010 (Fait V, line 24)			0
흉		Total unrelated business revenue from Part VIII, column (C), line 12		79	0.
⋖		Net unrelated business taxable income from Form 990-7, line 34		. 7ъ	0.
				Prior Year	Current Year
•	8	Contributions and grants (Part VIII, line 1h)	🗀		4,801,000.
5	9	Program service revenue (Part VIII, line 2g)			0.
Revenue	10	Investment income (Part VIII, column (A), lines 3, 4, and 7d)			0.
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_		Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)			4,801,000.
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		Benefits paid to or for members (Part IX, column (A), line 4)	····· }		0.
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5	l	Total fundraising expenses (Part IX, column (0), line 25)	-o∵	14,24, 3 N.	
ā		Other expenses (Part IX, column (A), lines 11a-11d, 1112 ECEIVED	╀⊢		4,770,000.
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	19	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			31,000.
Assets or Balances		Revenue less expenses. Subtract line 18 from line 12 HOV 2-4-2011		ginning of Current Year	End of Year
器	20	Total assets (Part X, line 16)	#) [<u></u>		51,000.
₩. =	ι	Total liabilities (Part X, line 26)			20,000.
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WILL	יון פוט ו	S discuss this return with the preparer shown above? (see instructions)			X Yes No

2-2:-11 U-A For Paperwork Reduction Act Notice, see the separate instructions.
SEE SCHEDULE O FOR ORGANIZATION MISSION STATEMENT CONTINUATION

	980 (2010) COMMISSION ON HO	OPE, GROWTH &	OPPORTUNITY	27-1920168	Page 2
Par	III. Statement of Program Service Accomp				ਦਿ
· 1	Chack if Schedule O contains a response to any question of the organization of mission.				
	THE COMMISSION WILL SHARE ITS FORMULATORS AND WILL ENCOURAGE	S RESEARCH AND	PERS TO COMMU	INICATE THEIR	uici
	VIEWS ON THE ISSUES OF CONSE	QUENCE TO THE	COMMISSION I	IRECTLY WITH	
	POLICY MAKERS AT ALL LEVELS	OF GOVERNMENT	THE COMMISS	SION WILL SEE	K
2	Did the organization undertake any significant program s	ervices during the year whi	ch were not listed on		
				¥e	s X No
	If "Yes," describe these new services on Schedule O.				s XNo
3	Did the organization cease conducting, or make significa	int changes in how it condu	ıcts, any program servic	8\$7	S LALINO
	If "Yes," describe these changes on Schedule O. Describe the exempt purpose achievements for each of the second o	the execularities is these less	rest american pondess by	. Avnender	
•	Section 501(c)(3) and 501(c)(4) organizations and section				
	allocations to others, the total expenses, and revenue, if		les reported.		
4a.	(Code:) (Expenses \$	0 - including grants of \$	0.) (Revenue \$	0.)
	N/A				
					
					
					
					
					
4b	(Code:) (Expenses \$	O . incheding greats of	0.) Marania \$	0. ;
~	N/A	uncounty grants or .	'—————————————————————————————————————) (navarius 4	
					
	·				
					
					
46	(Code:) (Expenses \$	0. Including grants of	·) (Revenue \$	0.)
					
					
					
4d	Other program services. (Describe in Schedule O.)				
-	(Expenses \$ Including grants of	5	(Revenue \$		
40	Total program service expenses				000
03200				Form	990 (2010)

•			Yes	No.
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	١.		x
2	is the organization required to complete Schedule B, Schedule of Contributors?	2	X	$\overline{}$
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for			
•	public office? If "Yes," complete Schedule C, Part I	3		X
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect			
	during the tax year? If "Yes," complete Schedule C, Part II	4		
5	is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or			
	similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5		X
6	Did the organization maintain any donor advised funds or any similar funds or accounts where donors have the right to			
	provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6		X
7	Did the organization receive or hold a conservation easement, including easements to preserve open space,			
	the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7		X
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete			
	Schedule D, Part III	8		X
9	Did the organization report an amount in Part X, line 21; serve as a custodian for amounts not listed in Part X; or provide			
	credit counseling, dabt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV	9	l	X
10	Did the organization, directly or through a related organization, hold assets in term, permanent, or quasi-endowments?			
	W "Yes, " complete Schedule D, Part V	10	<u> </u>	X
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X		$\overline{}$	-
	as applicable.	• • •	: :	
8	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D,			
	Part VI	118		X
þ	Did the organization report an amount for investments - other securities in Part X, line 12 that is 5% or more of its total			
	assets reported in Part X, line 167 If "Yes," complete Schedule D, Part VII	11b		X
C	Did the organization report an amount for investments - program related in Part X, line 13 that is 5% or more of its total			1
	assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	110		X
d	Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in			ľ
	Part X, line 16? If "Yes," complete Schedule D, Part IX	110	<u> </u>	X
•	Old the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	110	ļ	X.
1	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses			l
	the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	118		X
120	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete	ŀ	l	
	Schedule D, Parts XI, XII, and XIII	12=		X
P	Was the organization included in consolidated, independent audited financial statements for the tax year?		1	۱.
	if "Yes," and if the organization enswered "No" to line 12s, then completing Schedule D, Parts XI, XII, and XIII is optional	.125	├	X
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	23	├—	X
148	1	14a		1
D	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, and program service activities outside the United States? If "Yes," complete Schedule F, Parts I and IV	ء ا	!	x
48		14b	 	 ^
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or assistance to any organization or entity located outside the United States? If "Yes," complete Schedule F, Parts II and IV	15	1	X
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or assistance to individuals	13	├	 ** -
•	located outside the United States? If "Yes," complete Schedule F, Parts III and IV	16	i	X
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX.	-10	 	
••	column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I	17	1	X
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, times	 "	 	
	1c and 8a? If "Yes," complete Schedule G, Part II	18	1	x
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line \$27 if "Yes,"	<u> </u>	\vdash	╅═
-	complete Schedule G, Part III	19		X
20a	Did the organization operate one or more hospitals? If "Yes," complete Schedule H	20a	<u> </u>	X
Ь	if "Yes" to line 20s, did the organization attach its audited financial statements to this return? Note. Some Form 990 filers that		\vdash	
	operate one or more hospitals must attach audited financial statements (see instructions)	20b		L
			_	

Did the organization report more than \$5,000 of grants and other assistance to governments and organizations in the United States on Part IX, column (A), the 11 if "Yes," complete Schedule is Part I and if IX Column (A), the 11 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and if IX Column (A), the 27 if "Yes," complete Schedule is Part I and IX Column (A), the 27 if "Yes," complete Schedule is Part I and IX Column (A), the 27 if "Yes," complete Schedule is Part I and IX Column (A), the 27 if "Yes," complete Schedule is Part I and IX Column (A), the 28 is a section Schedule is Part I and IX Column (A), the 28 is a section Schedule is Part I and IX Column (A), the 28 is a section Schedule is Part I if "Yes," complete Schedule is Part I if Yes, complete Schedule is Part		990-2010) COMMISSION ON HOPE, GROWTH & OPPORTUNITY 27-1920	168	P	age 4
11 Lid the organization report more than \$5,000 of grants and other assistance to governments and organizations in the United States on Part IX, courting IX, the 17 W ** is, complete Schedule I, Part I and III 12 Did the organization report more than \$5,000 of grants and other assistance to inchidulas in the United States on Part IX, column (IA), the 27 H ** Yes, "complete Schedule I, Part I and III 12 Did the organization report more than \$5,000 of grants and other assistance to inchidulas in the United States on Part IX, column (IA), the 27 H ** Yes, "complete Schedule I, Part I and III 12 Did the organization answer ** Yes ** Vest Vest Vest Vest Vest Vest Vest Vest	Pa	rt IV.) Checklist of Required Schedules (continued)			
United States on Part IX, column (A), the 17 if "hes," complete Schedule I, Parts 1 and if 2	•			Yes	No
22 Did the organization report more than \$5,000 of grants and other assistance to inchinduals in the United States on Part IX, column (A), line 21 if "Nes, "complete Schedule I, Part I and IX." 23 Did the organization answer "Yee" to Part VII. Section A, tine 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and higher compensated employees? If "Yes," complete Schedule J." 24 Did the organization have a tax-exempt bond assess with an outstanding principal amount of more than \$100,000 as of the last day of the year, that twes issued after December 31, 2002? If "Yes," answer lines 24th through 24d and complete Schedule K. If "No", go to Ima 25 25 Did the organization maintain an escrew account other than a refunding secrew at any time during the year to defease any tax-exempt bonds? 26 Did the organization maintain an escrew account other than a refunding secrew at any time during the year to defease any tax-exempt bonds? 26 Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? 27 Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? 28 Section 6016(3) and 501c(4) organizations. Did the organization appears are secses benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization with a disqualified person in a prior year, and that the transaction has not one in year or any of the organization person outstanding as of the end of the organization's tax year? If "Yes," complete Schedule I, Part II 28 Was its on to or by a current or former officer, director, trustee, key employee, substantial person outstanding as of the end of the organization's tax year? If "Yes," complete Schedule I, Part IV 29 Did the organization provide a grant or other assistance to an officer, director, trustee, key employees, and the part IVEs, complete Schedule I, Part IV 29 Did the organiza	21	Did the organization report more than \$5,000 of grants and other assistance to governments and organizations in the			
22 Did the organization report more than \$5,000 of grants and other assistance to inchinduals in the United States on Part IX, column (A), line 21 if "Nes, "complete Schedule I, Part I and IX." 23 Did the organization answer "Yee" to Part VII. Section A, tine 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and higher compensated employees? If "Yes," complete Schedule J." 24 Did the organization have a tax-exempt bond assess with an outstanding principal amount of more than \$100,000 as of the last day of the year, that twes issued after December 31, 2002? If "Yes," answer lines 24th through 24d and complete Schedule K. If "No", go to Ima 25 25 Did the organization maintain an escrew account other than a refunding secrew at any time during the year to defease any tax-exempt bonds? 26 Did the organization maintain an escrew account other than a refunding secrew at any time during the year to defease any tax-exempt bonds? 26 Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? 27 Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? 28 Section 6016(3) and 501c(4) organizations. Did the organization appears are secses benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization with a disqualified person in a prior year, and that the transaction has not one in year or any of the organization person outstanding as of the end of the organization's tax year? If "Yes," complete Schedule I, Part II 28 Was its on to or by a current or former officer, director, trustee, key employee, substantial person outstanding as of the end of the organization's tax year? If "Yes," complete Schedule I, Part IV 29 Did the organization provide a grant or other assistance to an officer, director, trustee, key employees, and the part IVEs, complete Schedule I, Part IV 29 Did the organiza		United States on Part IX, column (A), line 17 if "Yes," complete Schedule I, Parts I and II	21		Х
22 Did the organization answer "Yes" to Part Vill, Section A, the 3, 4, of 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J. 24 Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that wes issued after December 31, 2002? If "Yes," answer lines 240 through 24d and complete Schedule K. If "No", go to fine 25 25 Did the organization maintain an escrew account other than a refunding escrew at any time during the year to defease any tax-exempt bonds? 26 Did the organization maintain an escrew account other than a refunding escrew at any time during the year to defease any tax-exempt bonds? 26 Did the organization act as an "on behalf of issuer for bonds outstanding at any time during the year to defease any tax-exempt bonds? 27 Did the organization act as an "on behalf of issuer for bonds outstanding at any time during the year? 28 Section 601(c)(3) and 601(c)(4) organizations. Did the organization expanse an excess benefit transaction with a disqualified person that go the year? 28 It is the organization act as an "on behalf of issuer for bonds outstanding set my time during the year? 29 Was a loan to or by a current or former officer, director, trustee, key employee, highly compensated employee, or disqualified person outstanding as of the end of the organization's tax year! "I'ves, "complete Schedule L. Part IV I I I I I I I I I I I I I I I I I I	22	Did the organization report more than \$5,000 of grants and other assistance to individuals in the United States on Part IX.			
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240 Dit the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the land day of the year, that was issued effort December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "Wo", go to line 25 Did the organization hivest any proceeds of tax-exempt bonds beyond a temporary period exception? Did the organization hivest any proceeds of tax-exempt bonds beyond a temporary period exception? Did the organization hivest any proceeds of tax-exempt bonds outstanding at any time during the year to defease any tax-exempt bonds? Old the organization haves that is enauged in an excess benefit menaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I Section 501(c)(3) and 501(c)(4) organizations. Did the organization engage in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organizations prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part II Was a lain to or by a current or former officer, director, trustee, key employee, highly compensated employee, or disqualified person outstanding as of the end of the organization's tax year? If "Yes," complete Schedule L, Part III Was the organization party to a business transaction with one of the following parties (see Schedule L, Part III Was the organization aparty to a business transaction with one of the following parties (see Schedule L, Part III A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part III A transity or which a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part III A transity or which a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part III A transity of which a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part III A transity of the organization receive mo			23		X
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b Did the organization havest any proceeds of tax-exempt bonds beyond a temporary period exception? c Did the organization maintain an escryw account other than a refunding escrow at any time during the year to defease any tax exempt bonds? d Did the organization act as an "on behalf of "issuer for bonds outstanding at any time during the year? 346 258 Section 501(c)(3) and 501(c)(4) organizations. Did the organization expanse in an excess benefit transaction with a disqualified person during the year? b is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction have not been reported on any of the organization profit Forms 990 or 990-EZ? // "Yes," complete Schedule L, Part I Was a loan to or by a current or former officer, director, trustee, key employee, highly compensated employee, or disqualified person outstanding as of the end of the organization's tax year? // "Yes," complete Schedule L, Part II 28 Was the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor, or a grant selection convettee member, or to a person related to such an individual? // "Yes," complete Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions): a A current or former officer, director, trustee, or key employee? // "Yes," complete Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions): a A current or former officer, director, trustee, or key employee? // "Yes," complete Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions): a A current or former officer, director, trustee, or key employee? // "Yes," complete Schedule L, Part IV instructions for rise," complete Schedule R, Part IV instructions for rise," complete Schedule R, Part IV instructions for rise," complete Schedule R, Part IV instructions for director, trustee, or key employee? If "Yes," complete S		Schedule K. If 'No", go to line 25	24a		х
c Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax exempt bonds? 28d Section 501(c)(3) and 501(c)(4) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? 28d Section 501(c)(3) and 501(c)(4) organizations. Did the organization engage in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-E27 if "Yes," complete Schedule L, Part II 28d Was a loan to or by a current or former officer, director, frustee, key employee, highly compensated employee, or disqualified person outstanding as of the end of the organization's tax year? if "Yes," complete Schedule L, Part III 29d Was the organization convertice a grant or other assistance to an officer, director, trustee, by employee, substantial contributor, or a grant selection convertice member, or to a person related to such an individual? if "Yes," complete Schedule L, Part III 29d Was the organization organization protect or former officer, director, trustee, or key employee (if Yes," complete Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions): 29d A current or former officer, director, trustee, or key employee? if "Yes," complete Schedule L, Part IV 29d Was the organization receive more than \$25,000 in non-ceah contributions? if "Yes," complete Schedule M. 29d X 29d Ut the organization receive more than \$25,000 in non-ceah contributions? if "Yes," complete Schedule M. 29d Did the organization organized to any tax-exempt or taxable entity? 29d Yes, "complete Schedule A, Part	ь	Did the organization treest any proceeds of tax-exempt bonds beyond a temporary paried exception?			
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Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M. Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I. Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II. Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I. Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Parts II, III, IV, and V, line 1 Did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? Did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 501(c)(3) organizations. Did the organization make any transfers to an exampt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 19? Note. All Form 990 filers are required to complete Schedule O	29		_		X
contributions? If "Yes," complete Schedule M 30					
Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Parts II, III, IV, and V, line 1 is any related organization a controlled entity within the meaning of section 512(b)(13)? Did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2 Did the organizations. Did the organization make any transfers to an exampt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part V X Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 18? Note. All Form 990 filers are required to complete Schedule O.			30		x
# "Yes," complete Schedule N, Part I Did the organization sell, exchange, dispose of, or transfer more than 25% of its net asseta? # "Yes," complete Schedule N, Part II Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? # "Yes," complete Schedule R, Part I Was the organization related to any tax-exempt or taxable entity? # "Yes," complete Schedule R, Parts II, III, IV, and V, line 1 Did the organization a controlled entity within the meaning of section 512(b)(13)? Did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? # "Yes," complete Schedule R, Part V, line 2 Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? # "Yes," complete Schedule R, Part V, bine 2 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? # "Yes," complete Schedule R, Part VI Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 19? Note. All Form 990 filers are required to complete Schedule O	31	Did the organization liquidate terminate or dissolve and cases operations?	_		
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## "Yes," complete Schedule R, Part V, time 2 36 37 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? # "Yes," complete Schedule R, Part V! 38 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 19? Note. All Form 990 filers are required to complete Schedule O 38 X	36		[1	1
37 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI 37 X S8 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 19? Note, All Form 990 files are required to complete Schedule O 38 X	-	If "Yes," complete Schedule R, Part V, line 2	36	ļ	l
and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI 37 X 38 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 19? Note. All Form 990 filers are required to complete Schedule O 38 X	37	Did the organization conduct more than 5% of its activities through an entity that is not a related amenization	H-	_	۳-
S8 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11 and 19? Note. All Form 990 files are required to complete Schedule O 38 X		and that is treated as a partnership for federal income tax numerous # "Yes " complete Schedule D. Dert VI	27	ł	x
Nate. All Form 990 filers are required to complete Schedule O	38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI. lines 11 and 197	- ~	 	
	_	A. A. A	38	x	Ī
					2010)

Form Par	990 (2010) COMMISSION ON HOPE, GROWTH & OPPORTUNITY 27-1920 tV Statements Regarding Other IRS Filings and Tax Compliance	168	P	ege 5
	Check if Schedule O contains a response to any question in this Part V			X
			Yes	No
19	Enter the number reported in Box 3 of Form 1096, Enter O If not applicable	$\overline{}$	169	NO
ь		·	•	İ
_	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable garring	1 1	٠. ا	•
•		ا ہے ا		İ
2-		1c		
24	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements,			ĺ
_	The the trib describes your driening what of wild introduced by a increasing		-	İ
D	If at least one is reported on line 2a, did the organization file all required federal employment tax returns?	2		<u> </u>
	Note. If the sum of lines 1s and 2s is greater than 250, you may be required to e-file. (see instructions)	ľ	-	
	Did the organization have unrelated business gross income of \$1,000 or more during the year?	30		X
þ	If "Yes," has it filed a Form 990-T for this year? If "No," provide an explanation in Schedule O	35		
4 a	At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a	1	i	
	financial account in a foreign country (such as a bank account, securities account, or other financial account)?	40		X
b	If "Yes," enter the name of the foreign country:			l
	See Instructions for filing requirements for Form TD F 90-22.1, Report of Foreign Bank and Financial Accounts.		_	
5a	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	5 a		X
b	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	5b		X.
	If "Yes," to line 5a or 5b, did the organization file Form 8886-T?	5c		
6a	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit			
	any contributions that were not tax deductible?	6a	X	
ь	If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts			
_	were not tax deductible?	66	X	
7	Organizations that may receive deductible contributions under section 170(c).	•		
	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?	79		X
_ h	If "Yes," did the organization notify the donor of the value of the goods or services provided?	76		
	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required			
•	to file Form 8282?	7c	1	X
ત	If "Yes," undicate the number of Forms 8282 filed during the year	32.	٠.	.,
	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	70	1	1
•	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	71		
	If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?	79		
h	If the organization received a contribution of care, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?	70	Г	·
8	Sponsoring organizations maintaining donor advised funds and section 509(a)(3) supporting organizations. Did the supporting		·	
•	organization, or a donor advised fund maintained by a sponsoring organization, have excess business holdings at any time during the year?	l a	l	1
9	Sponsoring organizations maintaining donor advised funds.		!	
•	Did the organization make any taxable distributions under section 4966?	90	ł	
8		96	 	┢
46	Did the organization make a distribution to a donor, donor advisor, or related person?		<u> </u>	
10	Section 501(c)(7) organizations. Enter: Initiation fees and capital contributions included on Part VIII, line 12	ļ. <i>"</i>		ŀ
8		1.	l	ŀ
		l∵.	l	į .
11	Section 501(c)(12) organizations. Enter:	!	ŀ.	1
	Gross Income from members or shareholders	1.	1	1
Ь	Gross income from other sources (Do not net amounts due or paid to other sources against	1	1	1
	amounts due or received from them.)	١'	I	1
12 8	Section 4947(a)(1) non-exempt charitable trusts. is the organization filing Form 990 in lieu of Form 1041?	122	╙	
þ	If "Yes," enter the amount of tax-exempt interest received or accrued during the year	1	Ι.	1 :
13	Section 501(c)(29) qualified nonprofit health insurance issuers.	<u> </u>	<u> </u>	
8	is the organization incensed to issue qualified health plans in more than one state?	13a	↓	!
	Note. See the instructions for additional information the organization must report on Schedule O.		l.	ŀ
Þ	Enter the amount of reserves the organization is required to maintain by the states in which the	:	۱.	1
	organization is licensed to issue qualified health plans	Į	1:	1
C	Enter the amount of reserves on hand	1_	<u> </u>	<u> </u>
14ø	Did the organization receive any payments for indoor tanning services during the tax year?	148	—	X
<u> </u>	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O	146	<u> </u>	<u> </u>
		Form	990	(2010)

	990 (2010) COMMISSION ON HOPE, GROWTH & OPPORTUNITY 27-1920	168	P	age 6.
Pai	t VI Governance, Management, and Disclosure For each 'Yes' response to lines 2 through 76 below, and for a	'No' r	espon	S8
•	to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.		•	
	Check if Schedule O contains a response to any question in this Part VI			\mathbf{x}
Sec	tion A. Governing Body and Management			
			Yes	No
18	Enter the number of voting members of the governing body at the end of the tax year	-		-110
	Enter the number of voting members included in line 1a, above, who are independent 1b 0			
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other	· ·		
-		2		X.
3	officer, director, trustee, or key employee? Did the organization delegate control over management duties customanly performed by or under the direct supervision	-	-	
J		3		X
4	of officers, directors of trustees, or key employees to a management company or other person? Did the organization make any significant changes to its governing documents since the phor Form 990 was filed?	3		X
5	Did the organization become aware during the year of a significant diversion of the organization's assets?	5		X
		8		X
-	Does the organization have members or stockholders?	-		
/8	Does the organization have members, stockholders, or other persons who may elect one or more members of the			х
	governing body?	7a 7b	<u> </u>	$\frac{\hat{\mathbf{x}}}{\mathbf{x}}$
	Are any decisions of the governing body subject to approval by members, stockholders, or other persons?	70		-
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year		•	
	by the following:	١.		v
8	The governing body?	80		$\frac{x}{x}$
ь	Each committee with authority to act on behalf of the governing body?	Bb		洠
9	is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the	١.	1	
	organization's mailing address? If "Yes," provide the names and addresses in Schedule O		<u> </u>	X
Sec	tion B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)			
			Yes	No
	Does the organization have local chapters, branches, or affiliates?	10a		X
b	If "Yes," does the organization have written policies and procedures governing the activities of such chapters, affiliates,	1	1	
	and branches to ensure their operations are consistent with those of the organization?	106		<u> </u>
118	Has the organization provided a copy of this Form 990 to all members of its governing body before filing the form?	11a	X	
ь	Describe in Schedule O the process, if any, used by the organization to review this Form 990.		١.	
12a	Does the organization have a written conflict of interest policy? If "No," go to line 13	120	<u> </u>	X
ь	Are officers, directors or trustees, and key employees required to disclose annually interests that could give rise	l	1	
	to conflicts?	12b		<u> </u>
C	Does the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe	l	1	
	In Schedule O how this is done	120		<u> </u>
13	Does the organization have a written whistleblower policy?	13		X
14	Does the organization have a written document retention and destruction policy?	14		X
15	Did the process for determining compensation of the following persons include a review and approval by independent		Ī	Γ.
	persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		ľ.	
a		15a	ł	.X
ь	Other officers or key employees of the organization	15b	1	X
_	If "Yes" to line 15a or 15b, describe the process in Schedule O. (See instructions.)		-	T
16a	Old the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a	ŀ··]. •	1
	Anyophia and the silver of the second	160		X
	If "Yes," has the organization adopted a written policy or procedure requiring the organization to evaluate its participation	-	 	┝═╌
•	in joint venture arrangements under applicable federal tax law, and taken steps to safeguard the organization's	١.	1.	l
	exempt status with respect to such arrangements?	165	1	
Sec	tion C. Disclosure	100	Ь—	
17	List the states with which a copy of this Form 990 is required to be filed NONE			
18	Section 8104 requires an organization to make its Forms 1023 (or 1024 if applicable), 990, and 990-7 (501(c)(3)s only) available	. Since		—
10	public inspection. Indicate how you make these available. Check all that apply.	107		
	Own wabsite Another's website X Upon request			
19				
10	Describe in Schedule O whether (and if so, how), the organization makes its governing documents, conflict of interest policy, a statements available to the public	אווו נאני	ancal	
20	statements available to the public. State the name, physical address, and telephone number of the person who possesses the books and records of the organization.	ه محمله		
a	STEVEN POWELL - 202-530-3332	wort	_	
	1900 M STREET, WASHINGTON, DC 20036			
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Form 990 (2010) COMMISSIC Part VII Compensation of Officers, D Employees, and Independen	irectors, T	rus	tee	GI 8,	ROV Key	VTI V Ei	np	OPPORTUNIT	Y 27-1920 ompensated	168 Page 7
Check if Schedule O contains a respo				this	a Pa	ut VI	1			
Section A. Officers, Directors, Trustees, Key I 1a Complete this table for all persons required to be list	Employees, a	nd h	ilah	est	Con	nber	188	ted Employees	the erespiration's law use	
Ust all of the organization's current officers. Enter -0- in columns (0), (E), and (F) if no compens -0- List all of the organization's current key empensation (Box 5 of Form W-2 and/or Box 7 of Form -0- List all of the organization's former officers, reportable compensation from the organization and List all of the organization's former director more than \$10,000 of reportable compensation from the persons in the following order: individual trust and former such persons.	o, directors; trustion was pake ployees, if any insated employer in 1099-MISC) of key employee and any related as or trustees om the organizations.	istecti.	e in: other re th: and h entz: rec	theti than in \$1 light stior siva ad a	her l ction an (100,1 est c est c s, ir	indivins for office 1000 for the company of the color of	idua ir de ir, di rom pens pens ocaj	als or organizations), requirition of "key employs rector, trustee, or key emp the organization and any reacted employees who macity as a former direct reganizations.	pardiess of amount of one;" loyes) who received reposited organizations, acceived more than \$10 tor or trustee of the organization or trustee of the organization.	compensation, riable 10,000 of genization,
Check this box if neither the organization no	or anv-related	oras	เกโซส	tion	cor	TIDO	nsai	ad any current officer.	firector, or trustne.	
(A)	(B)	عوبت		(0				(O)	(E)	(F)
Name and Title	Average	l	1	Pos	-	•		Reportable	Reportable	Estimated
	hours per	Ţ	18C k	all t	ihat	арр	ly)	compensation	compensation	emount of
	week (describe hours for related organizations in Schedule O)	individual traints or director	bisecutional events	Unicer	Ray employee	Rohest compensioned employee	Former	from the organization (W-2/1099-MISC)	from related organizations (W-2/1099-MISC)	other compensation from the organization and related organizations
STEVEN POWELL	E 00						ľ	20 000	0.	0
PRESIDENT / EXECUTIVE DIRECTOR	5.00	Н	_	X	\vdash	 	├	20,000.		0.
WILLIAM CANFIELD GENERAL COUNSEL	2.00	1		x		1	1	50,000.	Q.	0.
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Form 990 (2010)

Form 990 (2010) COMMISSIC	ON ON H	OP!	E,	G	RO	WTI	<u> </u>	& OPPORTUNIT	Y 27-19	20	168	Page 8
Part VII Section A. Officers, Directors, Tru (A) Name and title	(B) Average hours per week		Pos	c) ituor			(D) Reportable compensation	reos (continued) (E) Reportable compensatio	n	(F) Estima	ated	
(describe hours for related organizations in Schedule O)								· I	othic compen from organiz and rei organiza	sation the sation lated		
		<u> </u>					L					
		H	_	-	_		_	<u> </u>		_		
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			_							\dashv		
		\vdash	-	-	-	-				\dashv		
1b Sub-total					<u> </u>	\	L_	70,000.		0.		0.
d Total (add lines 15 and 1c)	·		<u> </u>			▶		70,000.		0.		0.
Total number of individuals (including but n compensation from the organization	ot limited to ti	nose	liste	ed a	bov	e) wi	101	eceived more than \$100	,000 in reportable	, 	ΙΥe	0 s No
3 Did the organization list any former officer, line 1a? If "Yes," complete Schedule J for s			e, ke					highest compensated e			3	ж
4 For any individual listed on line 1a, is the su and related organizations greater than \$15	ım of reportab	de c	•	ensi	atior	n enc	d ot	her compensation from	the organization		4	x
5 Did any person listed on line 1a receive or a rendered to the organization? # "Yes," com											5	x
Section B. Independent Contractors 1 Complete this table for your five highest co	mpensated in	dep	ende	ent c	ont	racto	ors 1	that received more than	\$100,000 of com	pens	stion from	
the organization. (A) Name and business	eddress							(B) Description of s	ervices	G	(C) ompensat	llon
MERIDIAN STRATEGIES, LLC NW, SUITE 300, WASHINGTO	7, DC 2	00	04			٠.		MEDIA PLACEM	ent	4	,319,	825.
MERIDIAN STRATEGIES, LLC NW, SUITE 300, WASHINGTON	N, DC 2	00	04				_	MEDIA PRODUC			275,	000.
MERIDIAN STRATEGIES, LLC NW, SUITE 300, WASHINGTO						· ,		advertising Technology	œ		105,	<u>175.</u>
							-				-	
Total number of independent contractors (i \$100,000 in compensation from the organic	_	not li	imite	d to		se (: 3	stec	d above) who received n	nore than	:	Form 990	

•		Statement of Revenue	(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512, 513, or 514
milar amounts	b	Federated campaigns 18 Membership dues 1b Fundraising events 1c 4801000 • Related organizations 1d Government grants (contributions) 1e				
and other sim	f	All other contributions, gifts, grants, and similar amounts not included above 17				
3:5	-	Total. Add lines 1a-1f	4801000.			ł
Program Service Revenue	20	Business Code		-		
复	b			·		
E [0			 		
	đ			ļ		
ğ	•					
-	f	All other program service revenue				
	g	Total. Add lines 2a-2f				<u> </u>
	3	Investment income (including dividends, interest, and other similar amounts)				
	4	Income from investment of tax-exempt bond proceeds		 		
ł	5	Royalties			ļ	
		(i) Roal (ii) Personal				
- 1	6 9	Gross Rents		· ·		
	Þ	Less: rental expenses		-		
	C	Rental Income or (loss)	· ·		`` ::	
ļ	d	Net rental income or (loss)			<u> </u>	
ı		Gross amount from sales of (i) Securities (ii) Other	•			
i		assets other than inventory				
- 1	_	Less: cost or other basis	·_ •		1	4 .
I	U			1		i -
		and sales expenses	•		1 ' '	Į.
J		Gain or (loss)	-	l .	1	Ţ
		Net gain or (loss)		 	ļ.,,,	ļ
Other Revenue	8 8	Gross income from fundraising events (not including \$ of	•			
Ž		contributions reported on line 1c). See	_			1
8		Part IV, line 18				}'
ЯΙ	b	Less: direct expenses b			·- : ,	
٦	c	Net income or (loss) from fundraising events		<u> </u>	<u> </u>	L
Ì	9 a	Gross Income from gaming activities. See			'	1
		Part IV, line 19			1.73	
	ь	Less: direct expenses b	••			1- y:
		Net income or (loss) from gaming activities		1	1 .	1
J		Gross sales of inventory, less returns		1	1:-	: ·
- 1	u		•		l	
1	ı.]		1
Į		Net Income or (loss) from sales of inventory		1	}	1
ł	c			 	 	
ŀ	44 -	Miscellaneous Revenue Business Code		1	1	1
- (11 a			 		
i	ь		 	 		
	C			<u> </u>		
}						
	đ	All other revenue	<u></u>	 	<u> </u>	<u> </u>
	d •	All other revenue Total. Add lines 11a-11d	4801000.	. 0.	0	

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[Part IX | Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns.

	not include emounts reported on lines 6b, 8b, 9b, and 10b of Pert VIII.	Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundralsing expensés
1	Grants and other assistance to governments and organizations in the U.S. See Part IV, line 21				
2	Grants and other assistance to individuals in				
	the U.S. See Part IV, line 22				
3	·				
	organizations, and individuals outside the U.S.				
	See Part IV, lines 15 and 16			<u> </u>	
4	Benefits paid to or for members			,	
5	Compensation of current officers, directors,				
	trustees, and key employees				
6	Compensation not included above, to disqualified				
	persons (as defined under section 4958(f)(1)) and	i			
	persons described in section 4958(c)(3)(B)				
7	Other salaries and wages				
B	Pension plan contributions (include section 401(k)			-	
	and section 403(b) employer contributions)				
9	Other employee benefits ,				
0	Payroll taxes				
1	Fees for services (non-employees):	20.000		00.000	
8	Management	20,000.		20,000.	
þ	Logal	50,000.		50,000.	
C	Accounting				
þ	Lobbying				
•	Professional fundraising services. See Part IV, line 17				
f	Investment management fees				
9		FF AAA		55,000.	
12	Advertising and promotion	55,000.		55,000.	
IJ	Office expenses	- 20 000		20 000	
4	Information technology	20,000.		20,000.	.
15	Royalties				
16	Occupancy				
7	Travel				
8	Payments of travel or entertainment expenses				
	for any federal, state, or local public officials				
19	Conferences, conventions, and meetings				
20	Interest				
21	Payments to affiliates				
2	Depreciation, depletion, and amortization				
23 14	Insurance Other expenses, itemize expenses not covered			4 . A.	
A	above. (List miscellangous expanses in line 24f. If line	. •]			
	24f amount exceeds 10% of line 25, column (Å) amount, list line 24f expenses on Schedule 0.)		·· .		
a	MENTA DI AMENDAM	4,319,825.		4,319,825.	<u> </u>
ь	MEDIA PRODUCTION	275,000.		275,000.	
	WEBSITE MAINTENANCE	25,000.		25,000.	
d	ECONOMIC RESEARCH	5,000.		5,000.	·
	COPYRIGHT FEES	175.		175.	
•	All other expenses				
5	Total functional expenses. Add lines 1 through 241	4,770,000.	0.	4,770,000.	
<u>-</u> -	Joint costs, Check here if following SOP				
	98-2 (ASC 958-720). Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising				

Par	₹X.	Balance Sheet			asavavo ragott
•			(A) Beginning of year		(B) End of year
	1	Cash - non-interest-bearing		1	51,000.
	2	Savings and temporary cash investments		2	
	3	Pledges and grants receivable, net		3	
	4	Accounts receivable, net		4	
	5.	Receivables from current and former officers, directors, trustees, key			· · · · · · · · · · · · · · · · · · ·
		employees, and highest compensated employees. Complete Part II			
		of Schedule L		6	- .
	6	Receivables from other disqualified persons (as defined under section			
		4958(f)(1)), persons described in section 4958(c)(3)(B), and contributing		-	
		employers and sponsoring organizations of section 501(c)(9) voluntary	- 1		
	1	employees' beneficiary organizations (see instructions)	' 1	8	
異	7	Nietze and Laure meetinghis met		7	
Assets	à	Inventories for sale or use		8	
•	9			9	
	_	Land, buildings, and equipment: cost or other		·	
		basis. Complete Part VI of Schedule D	1		l <i>,</i>
				10c	
	11			11	
	12	A second		12	
	13	A second		13	
				14	
	14	Intergible assets		15	
	15 16	Other assets. See Part IV, line 11	0.		51,000.
	17	Total essets. Add lines 1 through 15 (must equal line 34)		17	20,000.
	18	Accounts payable and accrued expenses		18	
	1	Grants payable		19	
	19	Deferred revenue		20	· · · · · · · · · · · · · · · · · · ·
_	20	Tax-exempt bond flabifiles		21	{
Liabilides	21	Escrow or custodial account liability. Complete Part IV of Schedule D			
\$	22	Payables to current and former officers, directors, trustees, key employees,		ŀ	
3	1	highest compensated employees, and disqualified persons. Complete Part II		22	-
_	l	of Schedule L		23	
	23	Secured mortgages and notes payable to unrelated third parties		24	
	24	Unsecured notes and loans payable to unrelated third parties		25	
	25	Other liabilities. Complete Part X of Schedule D	0.		20,000.
	28	Total liabilities. Add lines 17 through 25	· · · ·	20	20,000.
_	1	Organizations that follow SFAS 117, check here	1	١.,	
8	I	lines 27 through 29, and lines 33 and 34.	1	ــــــــــــــــــــــــــــــــــــــ	· ·
Balances	27	Unrestricted net assets	ļ. ————	27	
	28	Temporarily restricted net assets		28	
Ē	29	Permanently restricted net assets		29	
Ę		Organizations that do not follow SFAS 117, check here		: -	
8	l	complete lines 30 through 34.		. *	l - ^
5	30	Capital stock or trust principal, or current funds	0.		0.
\$	31	Paid-in or capital surplus, or land, building, or equipment fund	0.		0.
Net Assets or Fu	32	Retained earnings, endowment, accumulated income, or other funds	. 0.		31,000.
Z	33	Total net assets or fund balances	0.		31,000.
	34	Total liabilities and net assets/fund balances	0.	34	51,000.
					Form 990 (2010)

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Par	t XI Reconciliation of Net Assets			
	Check if Schedule O contains a response to any question in this Part XI			
1	Total revenue (must equal Part VIII, column (A), fine 12)	,801	.00	00.
2	Total expenses (must equal Part IX, column (A), line 25)	,770	.00	50.
.3	Revenue less expenses. Subtract line 2 from line 1			0.0.:
4	Net assets or fund balances at beginning of year (must equal Part X, line 33, column (A))			0.
5	Other changes in net assets or fund balances (explain in Schedule O)			Ö.
Ġ	Net assets or fund balances at end of year. Combine lines 3, 4, and 5 (must equal Part X, line 33, column (B)) 6	31	.00	00.
Par	t XII Financial Statements and Reporting			
	Check if Schedule O contains a response to any question in this Part XII		. 1	
			res	No
1	Accounting method used to prepare the Form 990: X Cash Accrual Cother		. 1	
	If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O.	ŀ 1.	. 1	
2a	Were the organization's financial statements compiled or reviewed by an independent accountant?	20		X
b	Were the organization's financial statements audited by an independent accountant?	26		X
	If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit,			
	review, or compilation of its financial statements and selection of an independent accountant?	2c	l	
	If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.			
d	If "Yes" to line 2a or 2b, check a box below to indicate whether the financial statements for the year were essued on a	ΙI	- !	
	separate basis, consolidated basis, or both:	1 1	ł	
	Separate basis Consolidated basis Both consolidated and separate basis	1 1	- 1	
3 e	As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit] [- 1	
	Act and OMB Circular A-1337	3a		<u>X</u>
Ь	If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit		- 1	
	or audits, explain why in Schodule O and describe any steps taken to undergo such audits.	36	<u> </u>	
		Form 9	190 r	/nrnc